

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

SWISSDIGITAL USA CO., LTD.,

Plaintiff,

v.

SAMSONITE GROUP S.A.; SAMSONITE  
LLC; SAMSONITE COMPANY STORES,  
LLC; and DIRECT MARKETING  
VENTURES, LLC,

Defendants.

Civil No. 1:24-cv-11636

**JURY TRIAL DEMANDED**

**DECLARATION OF WONJOON CHUNG IN SUPPORT OF  
DEFENDANTS' REPLY IN SUPPORT OF MOTION FOR SUMMARY JUDGMENT**

I, Wonjoon Chung, hereby declare as follows:

1. I am an associate at the law firm of Fish & Richardson P.C. and counsel of record for Defendants Samsonite Group S.A., Samsonite LLC, Samsonite Company Stores, LLC, and Direct Marketing Ventures, LLC (collectively, "Samsonite" or "Defendants") in the above-captioned matter.

2. I have personal knowledge of the matters set forth in this declaration and could testify competently thereto if called upon to do so.

3. This declaration is submitted on behalf of Defendants in support of their Reply in Support of their Motion for Summary Judgment Regarding the Correct Priority Date of U.S. Patent Nos 10,931,137, 10,931,138, and 11,601,009, and Invalidity of Certain Asserted Claims of Those Patents.

4. Attached hereto as **Exhibit 33** is a true and correct copy of excerpts from Defendants' First Set of Interrogatories to Plaintiff Swissdigital USA Co., Ltd., served November 1, 2024.

5. Attached hereto as **Exhibit 34** is a true and correct copy of excerpts from Plaintiff Swissdigital USA Co., Ltd.'s Second Supplemental Responses and Objections to Defendants' Interrogatories, served March 14, 2025.

6. Attached hereto as **Exhibit 35** is a true and correct copy of a document produced in this litigation by Plaintiff bearing the Bates number SWISSDIGITAL001889.

7. Attached hereto as **Exhibit 36** is a true and correct copy of a document produced in this litigation by Plaintiff bearing the Bates number SWISSDIGITAL001861.

8. Attached hereto as **Exhibit 37** is a true and correct copy of the transcript of the hearing held in *Swissdigital USA Co., Ltd. v. Samsonite International S.A.*, No. 6:23-CV-196 (W.D. Tex.), on September 15, 2023.

I declare under penalty of perjury that the foregoing is true and correct. Executed on May 23, 2025.

/s/ Wonjoon Chung  
Wonjoon Chung